

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,  
et al.,**

Defendants.

**CIVIL NO. 12-2039 (GAG)**

**JOINT MOTION OF THE PARTIES REQUESTING LIFTING OF STAY**

TO THE HONORABLE COURT:

Plaintiff, the United States of America, and Defendants, the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (collectively, “the Parties”), with the concurrence of the Acting Monitor and the Special Master, respectfully request that the Honorable Court enter an order lifting the stay of all monitoring team activities. In support of this request, the parties respectfully state as follows:

1. On April 10, 2019, the Court took the extraordinary step of staying all monitoring activities, with the exception of monitoring the police response to the May 1, 2019, demonstrations, until the Monitor produced a methodology with the consensus of the Parties. The Court Order specifically stated: “The parties and the monitor find themselves at a crossroads in the difficult process of reaching consensus as to a final methodology for the monitoring phase to begin. Because the same is essential for the Reform process to move forward, the Court hereby stays all monitoring team activities for thirty days or until the Court has approved a final methodology.” Order, Docket No. 1189 (Apr. 10, 2019).

2. As represented to the Court during the Status Conference of June 14, 2019, during the past month the Parties have been working collaboratively with the Acting Monitor and the Special Master to complete a consensus-based methodology to enable the Monitor's Office to begin independent compliance monitoring in the case.
3. The Parties, with the assistance of the Special Master, have reached an agreement on the Consensus Methodology on Use of Force, as a result of arduous work and a high level of collaboration with the Monitor and his team.
4. The Parties will continue to work with the Acting Monitor and the Special Master to complete the methodologies for the remaining areas of the Agreement by September 2019, as forth in the Schedule submitted to the Court. (D.E. 1255).
5. Due to the completion of the Use of Force Methodology, and the expectation that the remaining methodologies will be completed within the next three months, the parties understand that it is appropriate for the Court to lift the stay of the proceedings imposed on April 10, 2019, so that the compliance monitoring phase of the Agreement can get under way.

**WHEREFORE**, the Parties respectfully request that the Court take notice of this joint motion and enter an order lifting the stay of all monitoring team activities imposed on April 10, 2019, for the reasons set forth in this motion.

**WE HEREBY CERTIFY:** That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to the Acting Monitor, the Special Master, and all counsel of record.

**RESPECTFULLY SUBMITTED** this 17th day of June, 2019,

For Plaintiff UNITED STATES OF AMERICA:

**STEVEN H. ROSENBAUM**  
Chief, Special Litigation Section

*s/Luis E. Saucedo*

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